

INTELLI-CHECK, INC.

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November 19, 2002

Docket Management System
Attention: Docket No. FAA-2002-11666
U.S. Department of Transportation
400 Seventh Street, SW
Nassif Building, Room 401
Plaza Level
Washington, DC 20590-0001

Ladies and Gentlemen:

I am writing to offer the views of Intelli-Check, Inc. on the recently-adopted rule that requires a pilot to carry along with his or her pilot certificate an approved form of photo identification that, upon request, must be provided to designated individuals (i.e., TSA or FAA inspectors, NTSB investigators, and law enforcement personnel). We believe that the adoption of this rule is warranted by the ability of individuals to obtain false pilot credentials and to use those credentials to misrepresent who they are. In the aftermath of the events of September 11, tightening up security associated with pilot certificates makes good sense, and we applaud the FAA for this step.

We are concerned, however, that a false sense of security may result from an individual's ability to provide along with a pilot certificate an additional form of identification, such as a driver license, to an inspector or law enforcement official. Unfortunately, there are over 5,000 websites on the Internet where an individual may easily obtain fraudulent identification. In simple terms, this means that an individual in possession of a stolen or counterfeit pilot certificate can readily obtain a complementary form of false photo identification to support the pilot certificate that would most likely not be discovered by a visual inspection.

Intelli-Check, Inc. is a developer and marketer of an advanced state-of-the-art document verification system for authenticating the validity of driver licenses, government issued ID cards and military IDS used as proof of identity. To do so, Intelli-Check's multi-purpose ID-CHECK units analyze and display information encoded in magnetic strips and barcodes found on driver licenses, military identification and other forms of state and government-issued identification from more than 50 jurisdictions. It has been our experience that using today's technology, many forms of fraudulent identification such as driver licenses are produced with such quality that trained law enforcement personnel cannot visually discern a fake ID from an authentic one, even when a license presented is from their own jurisdiction. The ability of the Intelli-Check system to instantaneously detect a fraudulent ID has led to the acquisition of such systems to validate IDs to deter terrorism at military installations, high profile buildings, airports, nuclear power plants and other such critical infrastructure. Moreover, it has proven useful in preventing economic loss from check-cashing and credit card fraud and in precluding underage purchase of age-restricted products which is usually supported by fake IDs.

Although we fully support the purpose of the FAA's rule, we believe that the true intent of the rule will not likely be met without the availability of technology such as Intelli-Check's to enable FAA and TSA inspectors to ensure that credentials provided them are valid. While a casual lawbreaker may seek to

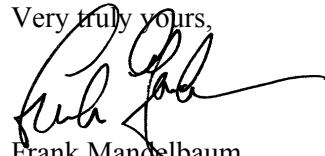
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perpetrate a crime with a stolen or fraudulent pilot certificate--and the current rule might offer adequate protection in such a circumstance, there is little question that terrorists, who may intend to use aviation as a means of committing a terrorist act, will likely have a degree of sophistication that would result in their obtaining more than one form of false ID. If there is no means of determining that the ID presented is valid, the rule will offer little protection against the types of acts it is designed to deter. Accordingly, Intelli-Check would strongly urge that the FAA consider either rule changes to address this potential shortfall or, alternatively, that steps be taken within the Department to ensure that adequate technology is available to TSA and FAA inspectors to properly validate ID's presented them. In this case, an advisory circular should be issued to apprise law enforcement personnel of the availability of technology to validate ID's and to encourage its use as a means of maximizing the effect of the rule.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Frank Mandelbaum', with a long, sweeping horizontal line extending to the right.

Frank Mandelbaum
Chairman & CEO